

## **EXHIBIT 4**

<p style="text-align: right;">Page 14</p> <p>1 A. No. They -- they weren't relevant. They  2 were mostly pictures to jog my memory about dates.  3 So things such as we went to a baseball game the day  4 after this. I would go back and find when was that  5 baseball game? Did I take pictures with my friends  6 at that baseball game? Things like that.  7 Q. Okay. Anything else that you can think of  8 today about other pictures that you saw to help jog  9 your memory besides the baseball game?  10 A. No.  11 Q. I'm going to ask that you provide those  12 photos to your counsel and then your counsel can  13 provide them to us. It's typical if -- it's typical  14 for me to be able to look at whatever you looked at  15 in order to jog your memory for a deposition.  16 A. Okay.  17 Q. Okay.  18 MS. ABRAMS: Noting our objection based on  19 relevance of those photos that she looked at, but...  20 MS. CLEMENT: Okay. Well, we get to look  21 at them.  22 MS. ABRAMS: With our -- the same  23 objections. You can proceed.  24 Q. (By Ms. Clement:) Have you had any  25 conversations with anyone other than your lawyers</p>	<p style="text-align: right;">Page 16</p> <p>1 A. No.  2 Q. So when you say they asked you to have a  3 deposition today, are -- are you referring to Jaylyn  4 Dean's lawyers?  5 A. Yes.  6 Q. Have you had any -- have you had any  7 conversations with Jaylyn Dean about her deposition  8 in this case?  9 A. No.  10 Q. Has Jaylyn Dean texted you about her  11 deposition in this case?  12 A. She's texted me that she was overwhelmed,  13 but no details about the deposition.  14 Q. And when did you receive this text from  15 Jaylyn Dean?  16 A. That would have been last Friday.  17 Q. I'm, likewise, going to ask you to produce  18 that to your counsel so that they can produce that  19 to us.  20 A. I don't have that.  21 Q. What do you mean you do not have the text  22 message between you and Jaylyn from last Friday?  23 A. They were messages on Snapchat. They  24 disappear after 24 hours.  25 Q. So was that something that you did not</p>
<p style="text-align: right;">Page 15</p> <p>1 about your deposition today?  2 A. Not involving the deposition.  3 Q. Help me understand what you mean by, "not  4 involving the deposition"?  5 A. My mom knows that I'm on here. She knew  6 what I time I had to be here.  7 Q. So it sounds like you may have had a  8 conversation with your mother that you were taking a  9 deposition today?  10 A. Yes.  11 Q. What did you discuss with your mother  12 about your deposition today?  13 A. I discussed with her that my friend Jaylyn  14 had a civil suit against Uber Technologies for  15 something that happened to her and that they asked  16 me to be deposed as a witness.  17 Q. Okay. And who is, "they"?  18 A. Jaylyn and her lawyers.  19 Q. Okay. And what was your mom's reaction  20 when she heard about this?  21 A. She was pretty indifferent. She told me,  22 you know, good luck. Don't let it bother you. Have  23 -- you know, be honest.  24 Q. Have you had any conversations with Jaylyn  25 Dean about your testimony today?</p>	<p style="text-align: right;">Page 17</p> <p>1 save?  2 A. No.  3 Q. Have you seen the notice of deposition for  4 your deposition today?  5 A. Yes.  6 Q. And have you seen the requests for  7 production with your deposition today?  8 A. Yes.  9 Q. Do you recall that that notice asked you  10 for communications with Jaylyn Dean about this  11 matter?  12 A. Yes.  13 Q. So would you agree that that text message  14 or that message through Snapchat is responsive to  15 our request for communications between you and  16 Jaylyn about this matter?  17 MS. ABRAMS: Object to form.  18 THE WITNESS: I did not believe it was.  19 She was telling me that -- the most detail it was  20 was, that was super overwhelming. I didn't expect  21 to feel so many emotions. I told her I was proud of  22 her and we left it at that.  23 Q. (By Ms. Clement:) Okay. But do you agree  24 that you were communicating with Jaylyn in writing  25 on Friday about this matter?</p>